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of the case, stating that other physicians had treated the patient without effect, and containing various other laudatory remarks. Plaintiff alleged that this publication which, though true and obtained from the father of the patient, was not authorized by plaintiff had a tendency to lead the public and his brother practitioners to believe that he was advertising and thereby caused them to class him in the category of quacks, who alone, it was alleged, resorted to advertising. Reversing a holding of the lower court that this petition stated no cause of action, the Supreme Court declares that it shows an actionable libel.

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**Duress by Labor Union.**—A union of bricklayers and plasterers voted to refuse to handle brick from any manufacturer delivering brick to boss masons employing nonunion men, and notice of the resolution was served on the manufacturer. Subsequently a manufacturer sold brick to a boss mason employing nonunion men. Learning of this, the union voted to assess damages of one hundred dollars against the manufacturer. Afterwards the manufacturer began to deliver brick to a boss mason employing union men. The union demanded payment of the hundred dollars under a threat that unless the same was paid the men employed by the boss mason would refuse to handle the brick, and payment was made. In *March v. Bricklayers' & Plasterers' Union No. 1*, 63 Atlantic Reporter, 291, it is held that this payment was extorted by means of threats, in violation of the statute of Connecticut, punishing any person who shall threaten to compel another against his will to do an act which such person has a legal right to do.

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**Primary Election Statutes.**—Various provisions of the Illinois primary election law are declared to be unconstitutional in *People v. Board of Commissioners of Chicago*, 77 Northeastern Reporter, 321. A provision that in a senatorial district, consisting of two counties, not more than two persons of the same political party, that is, one candidate for Senator and one for Representative, shall be nominated from any one county, is held in conflict with the constitutional provision merely requiring that Senators and Representatives shall be residents of the district. Other provisions to the effect that in Cook county no party may hold a primary election unless it cast 20 per cent. of the vote at the last election for President, while outside that county a party which cast 10 per cent, may hold a primary election, and that outside of Cook county a person may vote at the primaries by stating his present party affiliations, while in Cook county he cannot so vote if he has voted at the primary election of another party within two years, are declared to be void because special legislation and interfering with the freedom of voters.